

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A
BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.,

Defendant.

No. 6:20-cv-00812-ADA
6:20-cv-00813-ADA
6:20-cv-00814-ADA
6:20-cv-00815-ADA
6:20-cv-00816-ADA

JURY TRIAL DEMANDED

BRAZOS'S OPPOSED CASE READINESS STATUS REPORT

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development ("Brazos") hereby provides the following case readiness status report in advance of the initial Case Management Conference(s) ("CMC").¹

FILING AND EXTENSIONS

Brazos's Complaint in each of the above-captioned cases was filed on September 4, 2020. There has been one extension for a total of 45 days.

RESPONSE TO THE COMPLAINT

On November 16, 2020, Juniper responded to each of Brazos's Complaints by filing an Answer and Counterclaims. *See* Case No. 6:20-cv-00812, Dkt. 17; Case No. 6:20-cv-00813,

¹ Brazos attempted to obtain Juniper's consent to file this report jointly. Juniper has taken the position that pursuant to the Court's November 19, 2020 Standing Order Regarding Notice of Readiness for Scheduling Conference in Patent Cases, this report should not be filed until after Juniper responds to Brazos's complaints in Case Nos. 6:20-cv-00902 and 6:20-cv-00903. Because those cases do not involve the same patents (or patents that are related to the same patents) as the above-captioned cases, Brazos disagrees and therefore files this report unilaterally.

Dkt. 16; Case No. 6:20-cv-00814, Dkt. 16; Case No. 6:20-cv-00815, Dkt. 16; Case No. 6:20-cv-00816, Dkt. 16.

PENDING MOTIONS

Juniper filed an opposed motion to transfer each of the above-captioned cases to the Northern District of California on November 27, 2020. *See* Case No. 6:20-cv-00812, Dkt. 019; Case No. 6:20-cv-00813, Dkt. 18; Case No. 6:20-cv-00814, Dkt. 18; Case No. 6:20-cv-00815, Dkt. 18; Case No. 6:20-cv-00816, Dkt. 18.

RELATED CASES IN THIS JUDICIAL DISTRICT

There are no related cases in this judicial district involving the same patents. Including the above-captioned cases, there are seven cases pending in this Judicial District involving the same parties but different patents. Specifically, Brazos filed five complaints in the above-captioned cases against Juniper on September 4, 2020, and two additional complaints against Juniper on September 30, 2020. The seven pending cases are listed below:

- Case No. 6:60-cv-00812 (U.S. Patent No. 7,382,781) (answer to complaint filed Nov. 16, 2020);
- Case No. 6:20-cv-00813 (U.S. Patent No. 7,483,998) (answer to complaint filed Nov. 16, 2020);
- Case No. 6:20-cv-00814 (U.S. Patent No. 7,518,990) (answer to complaint filed Nov. 16, 2020);
- Case No. 6:20-cv-00815 (U.S. Patent No. 7,596,140) (answer to complaint filed Nov. 16, 2020);
- Case No. 6:20-cv-00816 (U.S. Patent No. 8,953,499) (answer to complaint filed Nov. 16, 2020);
- Case No. 6:20-cv-00902 (U.S. Patent No. 7,620,273) (response to complaint due Dec. 11, 2020); and
- Case No. 6:20-cv-00903 (U.S. Patent No. 8,284,656) (response to complaint due Dec. 11, 2020).

IPR, CBM, AND OTHER PGR FILINGS

There are no known IPR, CBM, or other PGR filings.

NUMBER OF ASSERTED PATENTS AND CLAIMS

Brazos has asserted 1 patent in each of the above-captioned cases. Brazos has not yet served its preliminary infringement contentions, but currently anticipates asserting the number of claims identified in the table below for each patent:

Patents	# of Anticipated Asserted Claims
U.S. Patent No. 7,382,781	5
U.S. Patent No. 7,483,998	5
U.S. Patent No. 7,518,990	10
U.S. Patent No. 7,596,140	23
U.S. Patent No. 8,953,499	9

APPOINTMENT OF TECHNICAL ADVISER

Brazos does not oppose the appointment of a technical adviser to the above-captioned cases; at the time of the filing of this report, Juniper has not taken a position regarding the appointment of a technical adviser.

MEET AND CONFER STATUS

Brazos and Juniper conducted a meet & confer conference for the above-captioned cases (“Brazos I–V,” respectively) on November 23, 2020. The parties anticipate conducting a meet & confer conference for Case Nos. 6:20-cv-00902 and 6:20-cv-00903 (“Brazos VI” and “Brazos VII,” respectively) promptly after December 11, 2020, the date upon which Juniper’s responses to the complaints in those cases are due. The parties further anticipate filing a Notice of Case Readiness for Brazos VI and VII promptly after conducting their meet & confer for these cases during the week of December 18, 2020.

The parties currently have no other pre-*Markman* issues for discussion at the CMC.

Respectfully submitted,

Dated: December 3, 2020

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